# Updating the Default Input Values for Exposure Variables in the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IEUBK Model): Estimation of Lead Bioavailability in Soil and Dust

# **Peer Review Report**

Prepared by:

TRW Lead Committee

Date:

December 31, 2013

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## TABLE OF CONTENTS

LIST OF APPENDICES	iii
EXECUTIVE SUMMARY	
1.0 INTRODUCTION	
1.1 Background	
2.0 PEER REVIEW PROCESS	
2.1 Peer Review Charge	
2.2 Summary of Findings	
3.0 RESULTS	
3.1 Selected Comments	_
4.0 REFERENCES	
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## LIST OF APPENDICES

Appendix – Peer Review Comments	1	1
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#### DRAFT — DO NOT CITE OR QUOTE

#### **EXECUTIVE SUMMARY**

The Peer Review Panel (herein referred to as Panel) reviewed a document titled Estimation of Lead Bioavailability in Soil and Dust: Update to the Default Values for the Integrated Exposure Uptake Biokinetic Model for Lead in Children (herein referred to as the Update Document) to address 12 charge questions regarding the information contained in the document.

The Updated Document presented a summary of the published literature and analysis of the available data regarding relative bioavailability (RBA) of lead in soil, soil-like materials and dust<sup>1</sup>.

This Peer Review Report is intended to provide a summary of the Panel's comments and the TRW Lead Committee's revisions to the Update Document in response to the Panel's recommendations.

The Panel's review resulted in an editorial revision of the Update Document. The Panel's findings are summarized below in Section 2.2 Summary of Findings and Section 3.0 Results. The revised final Update Document may be found at <a href="http://epa.gov/superfund/lead/trw.htm">http://epa.gov/superfund/lead/trw.htm</a>.

<sup>&#</sup>x27;Soil samples included discrete and composite samples from a number of NPL and Superfund sites, urban and residential land, small arms firing ranges, an incinerator site, as well as two samples where soil was spiked with galena or NIST SRM lead paint. Soil samples were obtained from both U.S. and international sites.

#### DRAFT — DO NOT CITE OR QUOTE

#### 1.0 INTRODUCTION

#### 1.1 Background

In the IEUBK model, bioavailability (*i.e.*, Absorption Fraction) represents a central tendency estimate for lead that is absorbed in a child's gastrointestinal tract into the systemic circulation of blood (U.S. EPA, 1994 a,b). Soluble lead in water and food is estimated to have an absolute bioavailability (ABA) of (ABA) of (ABA) based on the bioavailability of soluble lead acetate (*i.e.*, the standard reference material). Lead in soil and dust; however, are estimated to have an ABA of (ABA). This value corresponds to a relative bioavailability (RBA) of (ABA), *i.e.*, RBA=ABA<sub>soil or dust</sub>/ABA<sub>soluble lead acetate</sub> (ABA). These values were designed to provide representative estimates of lead absorption in children in the United States, but are not intended to replace representative site-specific data. Reliable, site-specific data on the bioavailability of lead in soil, dust, or other soil-like waste material can be used to improve the accuracy of lead absorption and resulting blood lead levels predicted for the sites.

The purpose of the Update Document was to review the data currently available on the lead bioavailability of soil and dust and to evaluate a potential revision to the current IEUBK model default ABA value of for soil and dust. Updating the IEUBK model default value may be considered appropriate if evidence is sufficient to indicate that a Reasonable Maximum Estimate (RME) (e.g., (ME)) would be more protective for site risk assessment by accounting for variability in the RBA of lead in soil or if the RME value would encourage the use of the accurate and inexpensive assay to derive a site-specific value for RBA.

The Update Document presents an analysis of the published literature and available data regarding RBA of lead in soil. The principal objectives of the literature review and data analysis were to:

- 1. Identify and summarize published literature potentially relevant to estimating RBA of lead in soil. Select studies that meet predetermined quality considerations.
- 2. Evaluate data contained in the pertinent literature to examine whether they are adequate and sufficient to conclude that the current IEUBK model RBA for lead in soils, soil-like materials, and dusts is representative for residential scenarios at CERCLA sites and RCRA Corrective Action sites.
- 3. Consider use of these data, if adequate and sufficient, to recommend a quantitative central tendency or upper bound estimate of RBA for use in the IEUBK model.

This Peer Review Report was prepared to provide a summary of the Panel's comments and the TRW Lead Committee's revisions to the Update Document in response to the Panel's recommendations.

#### 2.0 PEER REVIEW PROCESS

#### 2.1 Peer Review Charge

The Update Document qualifies as a technical document and is eligible for an independent peer review of the content. The EPA contracted Environmental Management Support, Inc. (EMS) to conduct an independent peer review of the Update Document. EMS conducted the review of the technical document in accordance with the EPA's Science Policy Council Peer Review Handbook (U.S. EPA, 2006). Management of the review consisted of the following general activities:

- Identified areas of expertise necessary for a scientifically rigorous review.
- Identified a list of candidate expert peer reviewers.
- Evaluated the expertise of each of the candidate expert peer reviewers.
- Created a short list of candidate expert peer reviewers.
- Determined the interest and availability of the short list of candidate expert peer reviewers.
- Determined for each of the remaining list of candidate peer reviewers any potential conflict of interest or lack of impartiality, or the appearance of any potential conflict of interest or lack of impartiality; excluding candidates with either.
- Finalized a team of three expert peer reviewers.
- Developed charge questions in conjunction with the EPA for the conduct of the peer review.
- Initiated the review.
- Coordinated the peer reviewers to finalize their written reviews.

The peer review was conducted as a letter review. Each reviewer was provided a copy of the Update Document and charge questions.

In seeking candidates to serve as peer reviewers, as well as selecting the final team of reviewers, an effort was made to include individuals with expertise in one of more of the areas identified by the EPA:

- Bioavailability Assessment
- Exposure Assessment or Risk Assessment
- Biokinetics
- Pharmacokinetics
- Pharmacodynamics
- Lead Toxicokinetics or Toxicokinetics Modeling
- Physiologically-Based Pharmacokinetic Modeling

The final team of expert reviewers on the Panel consisted of the following:

- Dr. Serap Erdal, University of Illinois Chicago School of Public Health;
- Ms. Yvette Lowney, Exponent Engineering and Scientific Consulting; and
- Dr. Paul Mushak, PB Associates.

The TRW Lead Committee thanks the Panel for providing valuable comments on the Update Document.

Efforts were made to ensure that each Panel member was allowed sufficient time to complete their review. Upon receipt by EMS, each letter review was examined and formatted for delivery to the EPA. The TRW Lead Committee's brief summary of the Panel's findings is included below as example comments received on the Update Document. The EPA's charge to the Panel and a summary of the Panel's comments are included as an appendix to this document.

#### 2.2 Summary of Findings

- The Panel agreed that the literature review yielded an appropriate representation of currently available data. One reviewer recommended additional publications that could be included in the Update Document's analysis. The TRW Lead Committee found that these citations were not appropriate or applicable to the Update Document.
- Each reviewer recommended reorganizing and adding additional details to the Update Document to improve the clarity. Two of the three reviewers acknowledged that the scientific evidence presented was appropriate and adequate to answer questions about the current IEUBK model default value.
- The Panel agreed that clear recommendations for the IEUBK model should be made based on the discussed evidence.

#### 3.0 RESULTS

The Panel's review comments were reviewed and considered by the TRW Lead Committee and resulted primarily in an editorial revision and a review of numerical values in the Update Document. The Panel recommended revising the Update Document's organization, but did not alter the scientific conclusions. In addition to the reorganization, the Update Document text was added to clarify the objective and findings based on the comments (see Section 3.1 below). Sections were retitled and reorganized as the following:

#### **Peer Review Draft**

**Revised Draft** 

Overview
Analysis
Swine Assays
Results
IVBA Assays
Results
Limitations of Study Methodologies
Predicting Soil Lead at RBA Sites
Implications for the IEUBK Model
References

Overview
Introduction
In Vivo Method (Swine Assay)
In Vitro Method (IVBA)
Results
In Vivo Method (Swine Assay)
In Vitro Method (IVBA)
Uncertainty
Recommendations for the IEUBK Model
Impact on IEUBK Model Predictions
References

The peer review panel provided a combined total of 47 comments. The majority of the comments were directed towards reorganizing the document for clarity; however, there were additional comments regarding numerical values presented in the document (see Section 3.1 below). Each comment was reviewed by the TRW Lead Committee and resolutions were incorporated into a revised draft. Additionally, the TRW Lead Committee followed up with peer reviewers on three comments to verify that the comments were understood and interpreted correctly.

Based on the peer review, the overall recommendation for the update lead bioavailability in soil and dust in the IEUBK model was: **Acceptable with revision** (as outlined).

The Appendix presents a summary of peer review questions and comments. The revised final Update Document may be found at <a href="http://epa.gov/superfund/lead/trw.htm">http://epa.gov/superfund/lead/trw.htm</a>.

## 3.1 Selected Comments

Representative comments were selected to demonstrate the process and overall consensus of the peer review.

<u>COMMENT (1)</u>: The organization of the document includes the various categories appropriate for addressing its purposes. However, the document is somewhat uneven across the major headings and with respect to their logic, clarity and conciseness. The Update Document's clarity, conciseness and conclusions (or lack thereof) could be simplified/clarified in some cases and expanded in others...The draft currently lacks a section, "Recommendations", wherein specific recommendations are clearly set forth in the form of RBA/ABA figures along with discussions of any limits to exposure scenarios for those recommended values.

<u>COMMENT (2):</u> The "Overview" and the "Implications for the IEUBK Model" should present clear TRW Lead committee recommendations based on the discussed evidence,

or perhaps better, add a new and final section to the draft labeled "Recommendations", which would include recommendations for a default ABA/RBA for EPA's lead exposure scenarios of regulatory interest.

<u>COMMENT (3)</u>: Missing elements include an opening section dealing with the intended purpose of the document, the intended purpose of the model, and the intended purpose of use of default values in the absence of site-specific information. A second missing element is a final section on Recommendations for use of default values and the scope of their use. Recommendations should include a general caveat that it would be difficult to use a single nationwide RBA/ABA figure for all sites and for all contamination media forms throughout the U.S.

Response to Comments 1-3: The text and tables were reorganized and additional language was added to improve the clarity of the document. Three examples of these revisions are provided below for the following sections of the Update Document: 'Overview', 'Implications for the IEUBK Model', and 'Recommendations'. In the text below black indicates original text, red indicates new text, strikeout indicates deleted text.

#### Overview

Since 1994, the Office of Solid Waste and Emergency Response (OSWER) has recommended the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IEUBK model) as a risk assessment tool to support environmental cleanup decisions at residential sites (U.S. EPA, 1994a, b). The IEUBK model uses empirical data from numerous scientific studies of lead uptake and biokinetics, contact and intake rates of children with contaminated media, and data on the presence and behavior of environmental lead to predict a plausible distribution or geometric mean (GM) of blood lead (PbB) for a hypothetical child or population of children<sup>2</sup>. The relative variability of PbB concentrations around the GM is defined as the geometric standard deviation (GSD). The GSD encompasses biological and behavioral differences, measurement variability from repeat sampling, variability as a result of sample locations, and analytical variability<sup>3</sup>, From this distribution, the IEUBK model estimates the risk (i.e., probability) that a child's or a population of children's PbB concentration will exceed a certain level of concern as

<sup>2</sup>The GM represents the central tendency estimate (e.g., mean, percentile) of PbB concentration of children from a hypothetical population (Hogan et al., 1998). The TRW recommends that the soil contribution to dust lead be evaluated by comparing the average or arithmetic mean of soil lead concentrations from a representative area in the child's yard (U.S. EPA, 1994a). If an arithmetic mean (or average) is used, the model provides a central point estimate for risk of an elevated PbB level. By definition, a central tendency estimate is equally likely to over- or under-estimate the soil/indoor dust RBA at lead-contaminated sites. Upper confidence limits (UCLs) can be used in the IEUBK model; however, the IEUBK model results could be interpreted as a more conservative estimate of the risk of an elevated PbB level. See U.S. EPA (1994b) for further information. The IEUBK model uses a log-normal probability distribution to characterize this variability (U.S. EPA, 1994a). The biokinetic component of the IEUBK model output provides a central estimate of PbB concentration, which is used to provide the geometric standard deviation (GSD). The GSD encompasses biological and behavioral differences, measurement variability from repeat sampling, variability as a result of sample locations, and analytical variability. In the IEUBK model, the GSD is intended to reflect variability in PbB concentrations where different individuals are exposed to different media concentrations of lead. The recommended default value for GSD (White et al., 1998).

currently established at micrograms per deciliter ( $\mu g/dL$ ) (U.S. EPA, 1994a, 1998, White et al., 1998).

The background default value for the Absorption Fraction, or eurrent IEUBK model default value for absolute bioavailability (ABA) of for lead in soil and indoor dust in the IEUBK model is or this value corresponds to a relative bioavailability (RBA, relative to water soluble lead) of or (relative to water soluble lead). The default values were originally derived from an absorption algorithm based on data from lead mass balance and feeding studies in human infants and children (U.S. EPA 1994a). and is intended to be a central tendency estimate (i.e., in the middle of the range encountered at sites). However, the default central tendency estimate is equally likely to over or underestimate soil lead RBA when applied to a specific site. Utilization of in vivo (juvenile swine) assays and more cost efficient in vitro bioaccessibility assays (IVBA) to provide site specific estimates of RBA reduces uncertainty in estimates of potential human health risk at a site.

When reliable data are available on the bioavailability of lead in soil, dust, or other soil-like waste material at a site, this information can be used to improve the accuracy of exposure and risk calculations at that site. In application for risk assessment, bioavailability adjustments are generally applied to the concentration term. Consequently, information related to the bioavailability of a contaminant in the exposure medium may be as important as the concentration of the contaminant in that medium (although bioavailability, generally expressed as a percent, will not generally vary as much as concentration).

This document reviews currently available data on soil/dust lead bioavailability and evaluates uncertainties in the current default value for soil and dust bioavailability in the IEUBK model (U.S. EPA, 2008).

The purpose of this document is to review the data currently available on the lead bioavailability of soil and dust and to revise the default value for the soil and dust from a central tendency value of to a Reasonable Maximum Estimate (RME) value of to encourage use of the accurate and inexpensive measures of site-specific bioavailability using in an EPA-approved in vitro method (U.S. EPA, 2007 a,b; 1989). U.S. EPA performed a literature search for data on soil lead bioavailability (January 2000-August 2010), and queried U.S. EPA Regions for relevant data through August 2010. In contrast to the existing default value (which is a central estimate), the proposed soil and dust absorption fraction default is an upper percentile based on information obtained from relevant publications, as well as Superfund site assessments with in vivo (swine assays) and in vitro bioaccessibility (IVBA) data (Table 1). Using an upper percentile value as a default is expected to reduce the likelihood that sites are screened out from further evaluation by

encompassing the majority of lead species at sites (except at firing ranges). Because a relatively inexpensive IVBA method (U.S. EPA, 2007a, b) is available to characterize site-specific RBA of soil lead for most sites, we strongly recommend that site-specific estimates of soil lead bioavailability used in place of the default value to improve the accuracy of IEUBK model estimates.

<u>Table 1. Comparison of current and proposed</u> <u>estimates for the Absorption Fraction variable</u> in the IEUBK model.

the the libbit model.			
	Absorption Fraction		
	Previous	Proposed RME	
	IEUBK Model	IEÛBK Model	
<u>Parameter</u>	CTE Defaulta	<u>Default<sup>b</sup></u>	
<u>Soil</u>		<b>45</b> .	
<u>Dust</u>			

aCentral tendency estimates

This document provides the technical basis for updating the Absorption Fraction variable in the IEUBK model. The intended audience is risk assessors familiar with using the IEUBK model. For further background information on both this variable and use of the IEUBK model in Superfund lead risk assessment, refer to U.S. EPA (1994a) or the Technical Review Workgroup for Lead (TRW) website (http://epa.gov/superfund/lead/trw.htm).

## Impacts on IEUBK Model Predictions

Bioavailability of lead in IEUBK model simulations of blood lead concentrations is governed by the model parameter, Absorption Fraction Percent, which sets the fraction of the ingested lead dose (µg/day) that is absorbed from the gastrointestinal tract. The current IEUBK model default for this parameter is 30% for lead in soil or interior house dust, which corresponds to an RBA of 60% (relative to water soluble lead). As previously noted, this value is intended to be a central tendency estimate and, as such, would be equally likely to under or over estimate RBA at any particular sites, because represents the percentile of all sites evaluated. The empirical distribution of RBA values in this data set suggests that values for soil and dust lead RBA exceeding are relatively uncommon (i.e., of the RBA estimates exceed to ). It is reasonable to expect that future RBA estimates exceeding will be uncommon at similar sites of regulatory interest (e.g., remedial investigation or risk assessment). Based on these considerations, the proposed value for the Absorption Fraction variable for soil and dust is estimated to be

bThe Reasonable Maximum Exposure (RME) is based on an upper percentile estimate

Of the sites (excluding firing ranges), the estimates include based on swine bioassays and based on IVBA assays. Distributions of RBAs for various relevant strata of the data set described in this memorandum are shown in Table 7. The sample of estimates for soils based on the combined data from IVBA assays (site means) and in vivo swine assays (excluding firing ranges and soils sieved to include particle sizes > ) has a mean of and a median of and a percentile range of (and a percentile value that corresponds to an RBA of This value is an upper percentile value that is expected to be in the upper percentile range reduces the likelihood that sites are screened out from further evaluation when, in fact, they may present a significant health risk to young children. Table 9 presents the impact of the proposed change in the default values from to on geometric mean PbB estimates for children and on a hypothetical PRG estimate.

Excluding firing ranges where lead may have RBA values of RBA, soil lead RBA can be expected to have values that fall within the percentile range. This distribution encompasses the IEUBK model default value for soil lead RBA. The model default value of corresponds to the the percentile of the data set. Lead in soils and dusts from small arms firing ranges had RBA values that exceeded (RBA) (Bannon et al., 2009). Unless site-specific RBA information is available from a validated assay, the TRW recommends a default RBA of (RBA) be used in cases where site history indicates that the site was a firing range.

## Added new section: 'Recommendations for the IEUBK Model'

Based on this analysis, (100) is recommended as the updated value for the Absorption Fraction for soil and dust variable (Figure 1). This value corresponds to an RBA of (100), and is expected to be in the upper percentile range reduces the likelihood that sites are screened out from further evaluation when, in fact, they may present a significant health risk to young children. The empirical distribution of RBA values in this data set suggest that values for soil lead RBA exceeding are relatively uncommon (i.e., of the RBA estimates exceed (100). It is reasonable to expect that future RBA estimates exceed (100). It is reasonable to expect that future RBA estimates exceeding (100) will be uncommon at similar sites of regulatory interest (e.g., remedial investigation or risk assessment). Unless site-specific RBA information is available from a validated assay, the TRW recommends a default RBA of (100) be used in cases where site history indicates that the site was a firing range. However, for all other sites the TRW does not recommend changing this value unless site-specific information is available that meet the Data Quality Objectives of the site.

The TRW recommends that all lead-contaminated Superfund Sites include representative site-specific bioavailability using the validated IVBA test for

estimating soil lead RBA at the site (U.S. EPA, 2008)4. The TRW also recommends that a central tendency estimate from representative site-specific IVBA analyses be used as the input to the IEUBK model for all decision units within a site. Using a central tendency estimate for calculation of risk or a soil cleanup goal is consistent with using central tendency values as inputs to the IEUBK model (White et al., 1998).

<u>COMMENT (4)</u>: The Results paragraph at the top of page 3 says the "mean of RBA estimates from soils" is percent, but this text refers to Table 2, which list a mean RBA of Many of the other values discussed in this Results paragraph are not included in the table, so it is hard to confirm the values.

<u>Response:</u> The values that were discussed in the text and in tables were reviewed for accuracy. Additional text was added to clarify pointers between the text and tables (see example revision below). In the text below black indicates original text, red indicates new text, strikeout indicates deleted text.

Tables 3 and 4 2presents the summary statistics for all test materials (total of different test materials, collected from different sites). The mean of RBA estimates from Analysis of soils (excluding galena-enriched soil, the NIST SRM paint sample, soil from firing ranges, and soils sieved at mm reported in Marschner et al., 2006) is (SD ), resulted in a median RBA estimate of is and with the percentile range is (Table 3): the mean RBA is (SD ); Table 4).

#### 4.0 REFERENCES

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Hogan, K.; Marcus, A.; Smith, R.; White, P. 1998. Integrated exposure, uptake, biokinetic model for lead in children: Empirical comparison with epidemiologic data. Environ. Health Perspect. 106(Suppl 6): 1557–1567. Available online at: http://www.ncbi.nlm.nih.gov.

Marschner, B.; Welge, P.; Hack, A.; Wittsiepe, J.; Wilhelm, M. 2006. Comparison of soil Pb in vitro bioaccessibility and in vivo bioavailability with Pb pools from a sequential soil extraction. Environmental Science and Technology 40(8): 2812-2818.

<sup>4</sup> The Office of Superfund Remediation and Technology Innovation has determined that a specific in vitro bioaccessibility (IVBA) assay for lead is a validated method for predicting RBA of lead in soils for use in site-specific human health risk assessment (U.S. EPA, 2007a,b, 2008, 2009). This IVBA assay is less expensive than and less time consuming than in vivo bioavailability bioassays that have been used to estimate soil lead RBA. As a result, this IVBA assay can be used to systematically characterize soil lead RBA at sites (i.e., multiple samples per site) to reduce uncertainty in site-specific risk assessments and cleanup goals.

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#### **Appendix - Peer Review Comments**

#### **CHARGE QUESTIONS to REVIEWERS**

#### for Peer Review of

"Updating the Default Input Values for Exposure Variables in the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IEUBK Model), *Estimation of Lead Bioavailability in* Soil and Dust"

#### August 2012

Peer Review Charge for U.S. Environmental Protection Agency (EPA). Updating the Default Input Values for Exposure Variables in the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IEUBK Model), *Estimation of Lead Bioavailability in Soil and Dust*.

EPA is seeking external peer review of the scientific basis supporting the update of several exposure variables in the Integrated Exposure Uptake Biokinetic Model for Lead in Children (IEUBK model). The IEUBK model was developed to evaluate exposure of children (IEUBK model) to lead and is used to assess risk and support environmental cleanup decisions at current or potential Superfund sites. The IEUBK model is maintained by U.S. EPA's Technical Review Workgroup Lead Committee (TRW).

The TRW Lead Committee has identified recent data that provide a more scientifically sound basis to develop nationally-representative, age-group specific default values for intake rates of lead in children. Given the available data, the TRW Lead Committee recommends updating the IEUBK model default values for the bioavailability of lead in soil and dust, water lead concentration in the United States, as well as water consumption, dietary consumption, and ventilation rates in children in the United States.

The current draft recommendations include updates to the bioavailability of lead in soil and dust, national drinking water lead concentration, as well as age-specific water, air, and food intake values. Because site-specific information is generally preferred to default values for exposure variables in the IEUBK model, it is anticipated that some of these defaults may be replaced with site-specific information. The goal of this review is to ensure that default values for exposure variables in the IEUBK model are scientifically sound and representative of reasonably current lead exposure in the United States.

**Expertise Required** 

Peer reviewers should have an advanced degree and/or experience in toxicology, mathematics, statistics, agricultural studies, environmental health, environmental science, or environmental engineering. EPA is seeking peer reviewers with expertise in (1) bioavailability assessment; (2) lead toxicokinetics and toxicokinetics modeling; (3) either exposure assessment or risk assessment. Familiarity with the IEUBK model is beneficial. No more than one candidate peer reviewer will be selected from the same agency, consulting firm, or university.

#### **Peer Review Charge Questions**

As a peer reviewer, you are asked to assess the adequacy of this document to provide a clear and concise explanation of the scientific issues regarding the evaluation of and recommendation for updating the IEUBK model. Please comment on the use of the approaches and methodologies to derive default values presented in the following technical document: *Estimation of Lead Bioavailability in Soil and Dust*.

In evaluating the technical document: *Estimation of Lead Bioavailability in Soil and Dust*, please respond to the charge questions below. If changes are to be made, please provide the technical basis for the proposed.

### **Section 1: General Charge Questions**

1.1 QUESTION: Is the organization of the document appropriate and is the document logical, clear and concise? Has EPA clearly synthesized the scientific evidence for the updated IEUBK model input values?

<u>COMMENT</u>: The reviewers generally agreed that the Update Document was successful at presenting the available data, and that the published literature used by the authors was appropriate. However, as noted by each reviewer, the Update Document needs to be reorganized for clarity and the recommendations for the IEUBK model should be stated.

1.2 QUESTION: Does the evidence presented support implementing the revisions to IEUBK model as default values for the US?

<u>COMMENT</u>: The reviewers agreed that the Update Document was successful at presenting the available data, and that the published literature used by the authors was appropriate. However, the reviewers agreed that the evidence does not support the use of a single ABA/RBA default, regardless of site history. Furthermore, the reviewers recommended that the evidence supports site-specific bioavailability testing for soils and dusts. Further detail on conditions that affect bioavailability was requested by one of the reviewers.

1.3 QUESTION: What are the strengths and weaknesses of approaches and methods employed given the available data?

<u>COMMENT – Strengths</u>: The reviewers agreed that the approaches and methods used and the comprehensive nature of the literature review provided a reliable estimation of ABA/RBA values for soil, soil-like materials, and dust (at Superfund Sites and firing ranges which resemble the sites used in this analysis).

<u>COMMENT – Weaknesses</u>: The reviewers noted that the Update Document does not provide a compelling synthesis of the information for drawing conclusions for nationally-representative values for use in the IEUBK model (i.e., sitespecific information should be collected). Each reviewer also agreed that the document also should be reorganized for clarity and additional text should be added regarding the purpose of the IEUBK model and how the default ABA/RBA values were derived. Recommendations should also be clarified.

1.4 QUESTION: Given the data available, what additional technical considerations can you recommend in the derivation of default values? Is EPA using appropriate models, datasets and assumptions on which to base a scientifically credible decision?

<u>COMMENT</u>: Each of the reviewers agreed that database used for this analysis was appropriate; however, two of three commented that the recommendations, implications for the IEUBK model were not well articulated. These reviewers suggested that the Update Document be reorganized for clarity.

1.5 QUESTION: Are you aware of any other significant data/studies that are relevant and should be included or referenced in this document? Please identify any additional studies that should be considered in the assessment of the IEUBK model values.

<u>COMMENT</u>: One of the three reviewers provided three publications for inclusion:

Munir Hussain Zia, Eton E. Codling, Kirk G. Scheckel, Rufus L. Chaney. In vitro and in vivo approaches for the measurement of oral bioavailability of lead (Pb) in contaminated soils: A review. Environmental Pollution, Volume 159, Issue 10, October 2011, Pages 2320-232.

Zia, M.H., Codling, E.E., Scheckel, K.G., Chaney, R.L. Fractional bioaccessibility: a new tool with revised recommendations for lead (Pb) risk assessment for urban garden soils and superfund sites. Environmental Science and Technology, submitted for publication. Lu, Y., Yin, W., Huang, L., Zhang, G., Zhao, Y., 2011. Assessment of bioaccessibility and exposure risk of arsenic and lead in urban soils of Guangzhou City, China. Environmental and Geochemical Health Volume 33, Pages 93-102.

#### Section 2. Specific Charge Questions

The current IEUBK model default value for relative bioavailability (RBA) is EPA, 1994). This value is intended to be a central tendency estimate that was derived from the evaluation of historical data (U.S. EPA, 1994). Based on a recent literature review, this document emphasizes three new recommendations for further assessing bioavailability with the IEUBK model at Superfund Sites:

- Evaluations of all lead-contaminated sites should include the application of the validated IVBA test (U.S. EPA, 2008) for estimating soil lead RBA at the site;
- If a site was used as a firing range, a default relative bioavailability of should be used (unless site-specific RBA information is available from a validated assay); and
- If a site has been impacted by other sources of lead contamination (e.g., lead-based paint), site-specific bioavailability information should be collected
- 2.1 QUESTION: Does the document present sufficient evidence to support these recommendations?

<u>COMMENT</u>: Each reviewer agreed that there is evidence to support the recommendations above; however, one reviewer noted that the evidence supports the current IEUBK model default ABA value ( ) in the absence of IVBA data. One reviewer noted that further data collection (under laboratory-controlled conditions) is needed. Another reviewer added that the specific recommendations were not articulated well in the Update Document.

2.2 QUESTION: Does the document provide the adequate information needed to successfully implement these recommendations into the IEUBK model? Specifically, does the document define, present, and explain the findings of the literature review accurately?

<u>COMMENT</u>: One reviewer noted that the specific recommendations were not articulated well in the Update Document. This reviewer also noted that the Update Document contains "flaws in transcribing numbers from the tables to the text, and includes some numbers in the text that are never presented in the tables".

2.2.1 QUESTION: Do you consider the timeline for the literature review (January 2000-August 2010) an appropriate representation of current available data?

<u>COMMENT</u>: All reviewers agreed – Yes.

2.2.2 QUESTION: Are you aware of relevant publications that are not highlighted in this document?

As described in Section 1.5, one reviewer provided three publications.

2.3 QUESTION: Are the differences between the in vivo and in vitro assay clearly defined? Is the rationale for using these assays in the analysis clear?

<u>Comment</u>: Two of the three reviewers agreed that the differences between invivo and in-vitro approaches were adequately described. One of these two reviewers noted that the rationale for using these assays should be expanded (e.g., rodents vs. swine). The third reviewer did not believe the differences were adequately discussed — citing a need for and consistent use of standardized terminology. This reviewer added that additional language should be added for clarity.

2.4 QUESTION: Does the document clearly define why using the upper percentile value of the is recommended over the current central tendency estimate of (excluding firing ranges, galena-enriched soils, and NIST paint)? Please comment on the strengths and weaknesses of the statistics used to derive and present the results of the bioavailability studies.

<u>COMMENT</u>: The reviewers generally agreed that the Update Document was successful at presenting the available data, and that the published literature used by the authors was appropriate. However, they agreed that Update Document needs to be reorganized for clarity, and one reviewer added that the numbers and text should be reviewed for accuracy.

2.5 Do you have any recommendations for additional analysis of the data? Please provide any additional data, concepts, or other considerations that would provide support for the determining a validated RBA value.

<u>COMMENT</u>: The reviewers generally agreed that the Update Document was successful at presenting the available data, and that the published literature

used by the authors was appropriate. However, the following recommendations were made:

- the Update Document needs to be reorganized for clarity;
- recommendations for the IEUBK model should be clearly stated;
- explanation of the scientific basis of the current default value of Shahashould be articulated;
- detail on the function of the IEUBK model, the purpose of the document, and the intended use of the default ABA/RBA value should be added;
- a brief discussion on evaluating ABA/RBA as a function of remediation techniques (e.g., use of phosphate amendments) should be added;
- a set of proposals to further research in this area in the future should be provided; and

As described in Section 1.5, one reviewer also provided three publications for inclusion in the Update Document.

# 2.6 QUESTION: Are there any elements missing that should be included or other information that would strengthen the document?

COMMENT: No comments were received.

#### **Section 3: Recommendations**

Based on your reading and analysis of the information provided, please identify and submit an explanation of your overall recommendation for the variable update on water lead concentration in the IEUBK model.

- 1. Acceptable as is
- 2. Acceptable with minor revision (as indicated)
- 3. Acceptable with major revision (as outlined)
- 4. Not acceptable (under any circumstance)

#### COMMENTS:

- Reviewer 1: The draft is acceptable after appropriate attention to the document's deficits as presented above.
- Reviewer 2: Acceptable with major revision (as outlined): As described above, the data compiled for this evaluation are comprehensive and likely support recommendations related to assumptions of the RBA of lead in soils, for application of the IEUBK model. The analysis and write-up, however, need to be reworked to substantiate any recommendations other than those currently supported by existing guidance. As it stands, the draft document is poorly organized, poorly articulated, contains redundancies and errors, and does not articulate specific recommendations with regard to how sites should be evaluated for the RBA of lead, nor how such data would be incorporated into the IEUBK model.

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• Reviewer 3: Acceptable with minor revision (as indicated).